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12 Attorneys for Plaintiff
13 JEANETTE MOORE

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 JEANETTE MOORE,
17 Plaintiff,
18 v.
19 J & J WORLDWIDE SERVICES, a Texas
20 Corporation; and, DOES 1-10, inclusive,
21 Defendant.

Case No. 3:19-cv-06356-RS

**STIPULATION AND ORDER TO
CONTINUE TRIAL DATE AND ALL
RELATED DEADLINES AS
MODIFIED BY THE COURT**

Complaint Filed: 07/17/2019
Action Removed: 10/04/2019
Trial Date: 09/06/2021

23 Pursuant to N.D. Cal. Local Rules 6-2 and 7-12, Plaintiff Jeanette Moore ("Plaintiff") and
24 Defendant J & J Worldwide Services ("Defendant") (collectively, the "Parties") hereby stipulate
25 as follows:

26 1. WHEREAS, the Parties attended mediation on February 11, 2021 with Vivien
27 Williamson, but were unable to resolve this case;

28 2. WHEREAS, as a result of the factual disputes uncovered during mediation, the

1 Parties agreed that they would need more time to conduct discovery beyond the current discovery
 2 cut-off dates, including depositions of Defendant's former employees and Plaintiff's deposition;

3 3. WHEREAS, Plaintiff's lead attorney at Benjamin Law Group P.C., Kristin Smith,
 4 left the firm, which required her colleague, Na'il Benjamin, to take over for Ms. Smith and to
 5 familiarize himself with the case;

6 4. WHEREAS, the Parties are currently coordinating depositions of relevant
 7 witnesses, but have encountered scheduling issues with their limited availability;

8 5. WHEREAS, Defendant's counsel also needs additional time to continue to meet
 9 and confer with Plaintiff's counsel in hopes of resolving its ongoing discovery disputes with
 10 Plaintiff's discovery responses and document production;

11 6. WHEREAS, the need to conduct further discovery will affect the Parties' ability to
 12 timely submit pretrial motions by the current pretrial motion deadline of June 7, 2021;

13 7. WHEREAS, Plaintiff's counsel is currently scheduled for trial in four matters
 14 between January 2022 and April 2022;

15 8. WHEREAS, the Parties respectfully request that the deadline for non-expert
 16 discovery be continued and the remaining trial deadlines be adjusted accordingly, as follows:

Event	Current Deadline	Revised Deadline
Non-Expert Discovery cut-off:	04/28/2021	10/08/2021
Further Case Management Conference		10/14/2021
Disclosure of identities and reports of expert witnesses:	05/12/2021	10/22/2021
Rebuttal expert reports:	05/26/2021	11/05/2021
Pretrial motion deadline	06/07/2021	11/18/2021
Close of expert discovery:	06/09/2021	11/22/2021

1 Pretrial conference	8/25/2021	2/9/2022
3 Trial date:	9/7/2021	2/22/2022

4 IT IS SO STIPULATED.

5 Dated: April 14, 2021

BENJAMIN LAW GROUP P.C.

7 By: /s/ Na'il Benjamin
8 Na'il Benjamin
Attorneys for Plaintiff
9 JEANETTE MOORE

10 Dated: April 14, 2021

JACKSON LEWIS P.C.

11 By: /s/ Hardev S. Chhokar
12 Tyler A. Brown
13 Hardev S. Chhokar
14 Attorneys for Defendant
15 J & J WORLDWIDE SERVICES, INC.

16 PURSUANT TO STIPULATION, IT IS SO ORDERED.

17 DATED: April 14, 2021



18 Hon. Richard Seeborg
19 Chief United States District Judge

20 4837-3376-6627, v. 1